

**REMARKS**

In the Office Action, the Examiner rejected Claims 1-13, which are all of the pending claims, under 35 U.S.C. §102 as being fully anticipated by U.S. patent application no. 2002/0049833 (Kikinis).

Independent claims 1, 6 and 10 are herein being amended to better define the subject matters of these claims. Also, this opportunity is being taken to update the reference to the related applications listed on page 1 of this application.

For the reasons discussed below, Claims 1-13 patentably distinguish over the prior art. The Examiner is, hence, respectfully asked to reconsider and to withdraw the rejection of Claims 1-13 under 35 U.S.C. §102, and to allow these claims.

The present invention, generally, relates to methods and systems for processing text files used to communicate between applications or between an application and an end user. As discussed in the present application, there are three basic problems in text file processing. One is how to describe and program for the structure of the text file, and another problem is how to achieve a mapping of data between the text file and the application. A third problem is describing the flow of control needed to process the file.

The present invention effectively addresses each of these problems. The invention solves the first problem, describing the text format, by using fragments of text as templates for parsing incoming files, or as prototypes to generate segments of output files. The second problem, mapping data from the text file to the application, is solved by specialized macro

classes, and the third problem, flow control, is solved by the interaction of templates and macros.

It should be noted that although the terms template and macro are widely used and have known definitions, these features are used in a particular way in the present invention. Independent claims 1, 6, and 10 are being amended to better describe these features in these claims.

With respect to the rejection of the claims over Kikinis, Applicants would like to point out that the passage of Kikinis, paragraphs 13 and 17-20, relied on to reject claim 1, does use the term template, but it is not made clear just what this template consists of. In the context, there is no reference to storing the template as text, and it appears unlikely that a set of parameters would be stored in simple text format; typically parameters consist of heterogeneous data types, not simple text. One skilled in the art would make the assumption that the parameters were not simple text.

Although Kikinis does mention the concept of translating a Web page, using a template, there is no explanation in that document of a mechanism or means by which this is to be done. Mere allusion to the fact that something might be possible, without any supporting details as to how to make it happen, do not establish that this result can in fact be achieved.

Kikinis does mention the usage of script, but this is hardly unique. Any software application involves use of procedural code of some type, whatever it is called. The macro classes referred to in the present application have a given form and purpose, and there is nothing remotely similar mentioned in Kikinis.

Claims 1, 6 and 10 clearly describe differences between the claim and Kikinis. In particular, these claims describe the templates as formed from fragments of the text file that include literals for an output text stream. Each of Claims 1, 6 and 10 also describe the macro classes as being used to further process the text files according to a given set of rules.

Thus, the templates and the macro classes as described in Claims 1, 6 and 10 are very different from the templates and the scripts disclosed in Kikinis.


The other references of record have been reviewed, and it is believed that these other references, whether they are considered individually or in combination, also do not disclose or suggest the subject matters of Claims 1, 6 and 10.

Because of the above-discussed differences between Claims 1, 6 and 10 and the prior art, and because of the advantages associated with those differences, these claims patentably distinguish over the prior art and are allowable. Claims 2-5 are dependent from Claim 1 and are allowable therewith, and Claims 7-9 are dependent from Claim 6 and are allowable therewith. Likewise, Claims 11-13 are dependent from, and are allowable with, Claim 10. The Examiner is, accordingly, respectfully requested to reconsider and to withdraw the rejection of Claims 1-13 under 35 U.S.C. §102, and to allow these claims.

In addition to the foregoing, there are a number of further, important differences between the preferred embodiment of the invention and the prior art. For instance, with respect to Claims 2 and 7, it is not at all evident how what is alleged to be disclosed by Kikinis (using data to fill in a template), has anything to do with Claims 2 and 7, which refer to using the macro class to read in a segment of the text file and to use the segment to initiate application update processing.

In view of the foregoing, it is believed that the present application is in condition for allowance, a notice of which is requested. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully submitted,

  
John S. Sensny  
Registration No.: 28,757  
Attorney for Applicant

Scully, Scott, Murphy & Presser  
400 Garden City Plaza  
Garden City, New York 11530  
(516) 742-4343  
JSS:jy